



California Regional Water Quality Control Board

San Francisco Bay Region



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Arnold Schwarzenegger
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Date: JUL 16 2007
File: 2199.9285(EWS)

Department of the Navy
Base Realignment and Closure Program Management Office West
ATTN: Thomas L. Macchiarella
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N00236.002937
ALAMEDA POINT
SSIC NO.5090.3

Subject: Comments on the Draft Action Memorandum for the CERCLA Time-Critical Removal Action, Installation Restoration Sites 5 and 10, Buildings 5 and 400 Storm Drain and Sewer Line, Alameda Point, Alameda, California

Dear Mr. Macchiarella:

Upon review of the above referenced document, we have the following comments:

Specific Comments

- 1) **Section 1.0 – Purpose** – Please include a brief discussion of previous storm drain removal efforts in this area.
- 2) **Section 1.0 – Purpose – Page 1-2 – Last paragraph** – This paragraph indicates that the removal action objective (RAO) for ²²⁶Ra is the total effective dose equivalent (TEDE) of <15 mrem/yr. Please reference the source(s) used for establishing this RAO.
- 3) **Section 2.1 – Site Background - Page 2-2 – fourth paragraph** – The reference for “PRC Environmental Management, Inc, 1996” is included in the references section, but dated 1997. Please correct this discrepancy.
- 4) **Section 2.1 – Site Background - Page 2-2 – fourth paragraph** – This paragraph mentions the previous storm drain and sewer line removal effort within Site 5. Please include more detail regarding the previous removal action, including what was removed, what contamination was left in place, and what issues or challenges were encountered during the previous removal action that will need to be considered during the proposed removal action. Please also indicate whether this previous effort was performed as a CERCLA action, and reference any applicable reports or documentation.
- 5) **Section 2.1 – Site Background - Page 2-3 – top paragraph** – This paragraph describes IR Site 10 as being approximately 3.9 acres in size, whereas previous documents¹ have indicated it is 4.3 acres. Please correct this discrepancy.

¹ Such as the Final Work Plan for Supplemental Remedial Investigation Sampling at OU-2C (May 2007).

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- 6) **Section 2.1.1 – Hydrology – Page 2-4 – Last sentence** – This sentence indicates previous investigations suggest there is minimal vertical gradient between the first and second water-bearing units. Please include any applicable references and indicate if any historic groundwater wells may be present that could serve as a vertical conduit between the water bearing units.
- 7) **Section 2.2.2 – Current Actions – Page 2-7** – Please include the reference for the final draft of the Historical Radiological Assessment (HRA) in this section. Currently the reference cited for the HRA is the Draft Work Plan for Supplemental RI Sampling at OU-2C.
- 8) **Section 4.3.1.2 – State Chemical-specific ARARs – Second paragraph from bottom** – Ensure that the reference to the RWQCB Basin Plan (1995) is the most up-to-date version. The most current version is dated December 22, 2006. Please also mention in this section that State Board Resolutions 68-16 and 92-49 are specified by reference in the Basin Plan.
- 9) **Figures 2-1 and 2-2** – These figures are essentially identical. Delete one and use the other as needed.
- 10) **Appendix B** – Please ensure that the ARARs table includes reference to state Board Resolutions 68-16 and 92-49. Please also ensure that the ARARs table includes reference to the General Permit for Storm Water Discharges Associated with Construction Activity (Water Quality Order 99-08-DWQ).

Please contact me at (510) 622-2355 or email ersimon@waterboards.ca.gov if you have any questions.

Sincerely,


Erich Simon
Project Manager

CC (via US Mail and email):

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